

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

In re: COMMONWEALTH BUSINESS CREDIT, LLC Case No. 21-31507

Debtor(s)

Judge John P. Gustafson

**MOTION BY TRUSTEE  
TO EMPLOY ATTORNEY**

The Motion of Ericka S. Parker respectfully represents:

- 1) Your applicant heretofore has been qualified and is now acting as Trustee in the above captioned cause.
- 2) Pursuant to 11 U.S.C. 327, the applicant, as trustee, desires to employ Eric Neuman and Raymond Beebe and the lawyers with which they are regularly associated at the firm of Diller & Rice LLC, 1107 Adams St., Toledo, OH 43604, effective the date of this Application.
- 3) It is necessary that applicant employ an attorney to assist the Trustee in evaluating assets of the estate.
- 4) Your applicant states that Eric Neuman and Raymond Beebe, and the attorneys regularly associated with him, and the employees of Diller & Rice LLC have no connection with the debtor, debtor's creditors, or any other party in interest, their respective attorneys and accountants, the United States Trustee or persons employed in the United States Trustee's office, except those connections disclosed in the accompanying affidavit, which Movant asserts are not disqualifying connections.
- 5) That the granting of this application is in the best interest of the estate and is authorized in 11 U.S.C. 327(d).
- 6) Your applicant further states that she has inquired and to the best of her knowledge, no one associated with these attorneys in the practice of law is related to any Bankruptcy Judge or the United States Trustee, or connected with any Bankruptcy Judge of the Northern District of Ohio or the United States Trustee.
- 7) Your applicant acknowledges that she has fully informed the attorneys as to the limitations on compensation set forth in Section 328(b), and the prohibition against sharing of compensation set forth in Section 504.

8) Applicant states that the charges to be made to the Trustee will be based upon the rates in effect at the time services are rendered. The current rates which are subject to future increases are:

Eric Neuman	\$300.00/hr.
Raymond Beebe	\$300.00/hr.

WHEREFORE, the Trustee prays the Court to approve the employment of Eric Neuman and Raymond Beebe of the law firm of Diller & Rice LLC, including the attorneys and paralegals with whom he is regularly associated to represent the Trustee herein at the rates of compensation indicated, subject to review of the Court, and for such other relief as is just and equitable.

/s/ Ericka S. Parker  
Ericka S. Parker (0068217)  
Law Offices of Ericka S. Parker LLC  
232 10<sup>th</sup> Street  
Toledo, OH 43604  
(419) 243-0900  
Fax (419) 243-0955

**CERTIFICATE OF SERVICE**  
**AND NOTICE PURSUANT TO LOCAL RULE 9013-1(a)**

Please take note that the Respondent has fourteen days from service of this motion to file and serve a response or a request for a hearing, and that if a response or request is not timely filed with the court and served on the Movant c/o Ericka S. Parker, Law Offices of Ericka S. Parker LLC, 232 10<sup>th</sup> Street, Toledo, OH 43604, the Court may grant the relief requested without hearing.

I certify that on 9/21/2021, a true and correct copy of the Motion to Employ was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Office of the US Trustee at (Registered address) at [usdoj.gov](http://usdoj.gov)

And by regular U.S. mail, postage prepaid on:

COMMONWEALTH BUSINESS CREDIT, LLC , Debtor(s) at 7644 KING'S POINTE ROAD,  
TOLEDO, OH 43617

**/s/Ericka S. Parker**

Ericka S. Parker (0068217)  
P.O. Box 262  
Curtice, OH 43412  
419-243-0900  
FAX (419) 243-0955  
[esparker@sbcglobal.net](mailto:esparker@sbcglobal.net)

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

In re: COMMONWEALTH BUSINESS CREDIT, LLC

Case No. 21-31507

Debtor (s)

Judge John P. Gustafson

**AFFIDAVIT**

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Eric Neuman, being first duly sworn, deposes and states as follows:

1) That this Verified Statement is made pursuant to the provisions of 11 U.S.C. §327 of the Bankruptcy Code regarding employment of professional persons, and in light of the restrictions imposed thereon by Bankruptcy Rules 2014 and 5002;

2) That this Verified Statement supplements the disclosures contained in and accompanying the Motion for Authority to Employ Counsel filed herewith;

3) That I am an Attorney at Law authorized to practice in both Federal and State Courts in the State of Ohio;

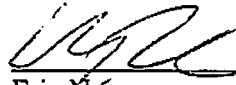
4) That I practice law under the firm name of Diller and Rice LLC. The firm maintains offices for the practice of law at 1107 Adams St., Toledo, OH 43604;

5) That this Verified Statement affirms to this Court that neither myself, nor any person with whom I am associated in the practice of law, or employed by my firm in the practice of law, is a relative by blood or marriage of any Bankruptcy Judge of the Northern District of Ohio; and that neither myself, nor any member of my firm, or employed by my firm, is not now, nor has ever been, so connected with any such Judge that would render my firm's appointment, or the Court's approval of my firm's employment in the within cause improper;

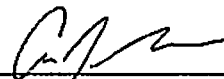
6) That this Verified Statement is to fully disclose to the Court that to the best of my knowledge, I know of no matters that might be considered by any party to create an issue or claim of conflict or lack of being a disinterested party; and neither myself, nor any member of my firm, nor any employee of my firm, has any connections to the Judge, the Debtor, any creditors, or any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee;) That this Verified Statement affirms Applicant's acknowledgement that he is fully informed as to the limitation on compensation set forth in Section 328(b) and the prohibition against sharing of compensation set forth in Section 504;

8) That this Verified Statement affirms Applicant's knowledge of the Guidelines for Compensation and Expense Reimbursement of Professionals commonly known as "General Order No. 93-1" and receipt of a copy of said Order;

FURTHER THE AFFIANT SAITH NAUGHT.

  
Eric Neuman

Sworn to and subscribed before me a Notary Public this 21<sup>st</sup> day of September, 2021.

  
Notary Public

ADAM JOSEPH MOTYCKA, Attorney At Law  
Notary Public - State of Ohio  
My Commission Has No Expiration Date  
Section 147.03 O.R.C.

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NORTHERN DISTRICT OF OHIO**

In re: COMMONWEALTH BUSINESS CREDIT, LLC

Case No. 21-31507

Debtor (s)

Judge John P. Gustafson

**AFFIDAVIT**

\*\*\*\*\*

Raymond Beebe, being first duly sworn, deposes and states as follows:

1) That this Verified Statement is made pursuant to the provisions of 11 U.S.C. §327 of the Bankruptcy Code regarding employment of professional persons, and in light of the restrictions imposed thereon by Bankruptcy Rules 2014 and 5002;

2) That this Verified Statement supplements the disclosures contained in and accompanying the Motion for Authority to Employ Counsel filed herewith;

3) That I am an Attorney at Law authorized to practice in both Federal and State Courts in the State of Ohio;

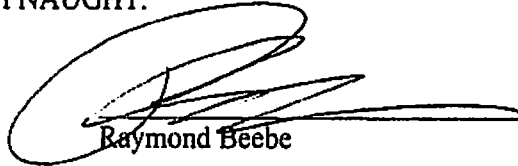
4) That I practice law under the firm name of Diller and Rice LLC. The firm maintains offices for the practice of law at 1107 Adams St., Toledo, OH 43604;

5) That this Verified Statement affirms to this Court that neither myself, nor any person with whom I am associated in the practice of law, or employed by my firm in the practice of law, is a relative by blood or marriage of any Bankruptcy Judge of the Northern District of Ohio; and that neither myself, nor any member of my firm, or employed by my firm, is not now, nor has ever been, so connected with any such Judge that would render my firm's appointment, or the Court's approval of my firm's employment in the within cause improper;


6) That this Verified Statement is to fully disclose to the Court that to the best of my knowledge, I know of no matters that might be considered by any party to create an issue or claim of conflict or lack of being a disinterested party; and neither myself, nor any member of my firm, nor any employee of my firm, has any connections to the Judge, the Debtor, any creditors, or any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee;) That this Verified Statement affirms Applicant's acknowledgement that he is fully informed as to the limitation on compensation set forth in Section 328(b) and the prohibition against sharing of compensation set forth in Section 504;

8) That this Verified Statement affirms Applicant's knowledge of the Guidelines for Compensation and Expense Reimbursement of Professionals commonly known as "General Order No. 93-1" and receipt of a copy of said Order;

FURTHER THE AFFIANT SAITH NAUGHT.

  
Raymond Beebe

Sworn to and subscribed before me a Notary Public this 21 day of September, 2021.

  
Notary Public

ADAM JOSEPH MOTYCKA, Attorney At Law  
Notary Public - State of Ohio  
My Commission Has No Expiration Date  
Section 147.03 O.R.C.